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9	Consumer Protection Branch PO Box 386	FILED.
10	Washington, DC 20044 (202) 598-8337 / (202) 307-0050	DATED: 10:36 am, January 19, 2024
11	daniel.e.zytnick@usdoj.gov timothy.t.finley@usdoj.gov	U.S. MAGISTRATE JUDGE
12	Attorneys for the United States	
13	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
14	DISTRICT	or nevada
15	UNITED STATES OF AMERICA,	
16	Plaintiff,	Case No. 2:24-mj-00666-BNW
17	v.	GOVERNMENT'S MOTION TO SEAL COMPLAINT
17 18	v. POUPAK JANNISSAR,	SEAL COMPLAINT
18	POUPAK JANNISSAR, Defendant.	SEAL COMPLAINT
18 19 20	POUPAK JANNISSAR, Defendant. The government respectfully moves the	SEAL COMPLAINT (Filed Under Seal) is Honorable Court for an Order sealing the
18 19 20 21	POUPAK JANNISSAR, Defendant. The government respectfully moves th Complaint, this motion, and the Court's Seali	SEAL COMPLAINT (Filed Under Seal) is Honorable Court for an Order sealing the above-captioned matter, until
18 19 20 21 22	POUPAK JANNISSAR, Defendant. The government respectfully moves the Complaint, this motion, and the Court's Sealing such time as this Honorable Court, or another.	SEAL COMPLAINT (Filed Under Seal) is Honorable Court for an Order sealing the ng Order, in the above-captioned matter, until
18 19 20 21	POUPAK JANNISSAR, Defendant. The government respectfully moves th Complaint, this motion, and the Court's Seali	SEAL COMPLAINT (Filed Under Seal) is Honorable Court for an Order sealing the ng Order, in the above-captioned matter, until

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In this case, an order sealing the Complaint would be appropriate because the defendant has not yet been arrested, and the existence of this investigation is neither public nor known to the defendant, and its disclosure may alert the defendant of a pending arrest. Accordingly, there is reason to believe that the disclosure of the information contained within the Complaint will jeopardize the investigation, including by giving the defendant an opportunity to flee or continue flight from prosecution, or destroy or tamper with evidence.

Accordingly, there is reason to believe that notification of the existence of the complaint will seriously jeopardize the investigation and would likely place law enforcement at higher risk of confrontation when securing the arrest of the defendant.

DATED this 19th day of January, 2024.

Respectfully submitted, JASON M. FRIERSON United States Attorney



RICHARD ANTHONY LOPEZ Assistant United States Attorney

DANIEL ZYTNICK TIMOTHY FINLEY Trial Attorneys U.S. Department of Justice Consumer Protection Branch

Case 2:24-cr-00020-APG-DJA Document 2 Filed 01/19/24 Page 4 of 4 FILED. DATED: 10:37 am, January 19, 2024 1 U.S. MAGISTRATE JUDGE 2 UNITED STATES DISTRICT COURT 3 DISTRICT OF NEVADA 4 UNITED STATES OF AMERICA, 5 Plaintiff, Case No. 2:24-mj-0066-BNW 6 v. ORDER ON GOVERNMENT'S MOTION TO SEAL COMPLAINT 7 POUPAK JANNISSAR, (Filed Under Seal) 8 Defendant. 9 Based on the pending motion of the Government, and good cause appearing 10 11 therefor, IT IS HEREBY ORDERED that the Complaint, the Government's motion, and 12 this Court's Sealing Order, in the above-captioned matter shall be sealed until further Order 13 of the Court. 14 DATED this 19th day of January, 2024. 15 16 17 HONORABLE BRENDA N. WEKSLER UNITED STATES MAGISTRATE JUDGE 18 19 20 21 22 23

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